

EXHIBIT A

Defendant.

DECLARATION OF SARAH BADDELEY

5. Thereafter, my colleague and I reached out to individual government attorneys to tender the defense of this claim to the United States government. A senior attorney at DHHS

was assigned on January 11 but informed me that the Government is still reviewing the filing to determine FTCA coverage.

6. Fenway has no record of any administrative claim filed by Plaintiff with DHHS under the FTCA and I am not aware of any.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 22, 2024

/s/ Sarah Baddeley

Sarah Baddeley